

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Comcast of Massachusetts I, Inc.

Plaintiff,

vs.

Bill Grammer

Defendant

) Case No.: **1:04-cv-10867 PBS**
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**PLAINTIFF'S MOTION TO EXTEND
TIME TO MOVE FOR DEFAULT
JUDGMENT OR TO ASSENT TO
OPENING OF DEFAULT**

NOW COMES Plaintiff, Comcast of Massachusetts I, Inc., to the above-captioned case respectfully requests that this Court extend the deadlines for the Plaintiff to move for Default Judgment to July 31, 2005.

As grounds, the Plaintiff states:

1. Plaintiff's Counsel has been contacted by Counsel for the Defendant, Attorney Stanley P. Roketenetz, Jr. of Woburn, MA.
2. Plaintiff's Counsel and Defendant's Counsel are in substantive negotiations to possibly resolve this matter.
3. Attorney Roketenetz assents to this motion.

In further support of this motion, see affidavit of John M. McLaughlin

Certification pursuant to LR D. Mass 7.1 (A) (2)

Plaintiff's counsel certifies that he has conferred with Defendant's Counsel, who assents to this motion.

Respectfully Submitted for the Plaintiff,
Comcast of Massachusetts I, Inc.
By Its Attorney

6/9/05/
Date

/s/ John M. McLaughlin
John M. McLaughlin (BBO: 556328)
Green, Miles, Lipton & Fitz-Gibbon LLP
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CERTIFICATE OF SERVICE

I, John M. McLaughlin, attorney for the Plaintiff, hereby certify that on the 9th day of June 2005, a copy of the foregoing motion and affidavit were sent via electronic mail to

Attorney Stanley P. Roketenetz, Jr.
sroketenetz@yahoo.com

/s/ John M. McLaughlin
John M. McLaughlin